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7 UNITED STATES DISTRICT COURT  
8 FOR THE CENTRAL DISTRICT OF CALIFORNIA

9 TRANSAMERICAN LIFE  
10 INSURANCE COMPANY,

11 Plaintiff,

12 VLADIMIR LUKASHIN,  
OKSANA FAERMAN; GOLDEN  
13 AGE HOME CARE, AND  
ROBERT PARKENS (Individually)  
14 And as Principal of Gold Age Home  
Care),

15 Defendants.  
16

CASE NO. 2:19-CV-00662-SVW-  
JPR

Hon. Stephen V. Wilson

**DECLARATION OF JULIA  
SKLAR IN SUPPORT OF  
DEFENDANT VLADIMIR  
LUKASHIN'S EX PARTE  
APPLICATION TO CONTINUE  
TRIAL AND RELATED PRE-  
TRIAL DEADLINES, AS BASED  
ON THE STIPULATION OF  
PARTES**

17  
18 I, JULIA SKLAR, declare:

19 1. I am an attorney at law licensed to practice before all the courts of the  
20 State of California, and have been admitted to this Court. I am the attorney of record  
21 for Defendant for Defendant Vladimir Lukashin ("Defendant"). The following is  
22 based upon my personal knowledge and beliefs, if called upon as a witness to testify  
23 in this matter, I could and would testify competently thereto.

24 2. This declaration is submitted in support of Defendant Vladimir  
25 Lukashin' Ex Parte Application to Continue Trial and Related Pre-Trial Deadlines, as  
26 the Application is based on the Stipulation of Parties.

27 3. This is the first request of Defendant Vladimir Lukashin to continue  
28 scheduled events in this matter.

1           4.     Plaintiff Transamerica Life Insurance Company (“Plaintiff”) filed this  
2 action against Defendants Vladimir Lukashin, an individual, Oksana Faerman, an  
3 individual, Golden Age Home Care, and Robert Parkens, individually and as the  
4 principal of Gold Age Home Care. Plaintiff alleges that defendants defrauded the  
5 insurance company.

6           5.     The complaint includes a claim for fraud and a number of related causes  
7 of action. The complaint was filed on January 29, 2019. The only defendant who has  
8 not been served in the action and did not answer to the complaint is Oksana Faerman.

9           6.     On April 10, 2019, the parties met and conferred in advance of Court’s  
10 Initial Status Conference. The Court held the conference on April 10, 2019. At that  
11 time, the court set the following dates: Discovery Cut Off Date - August 26, 2019;  
12 Dispositive Motion Nearing - August 26, 2019; Pretrial Conference – October 22,  
13 2019; Jury Trial - October 22, 2019. There is a dispute among the parties regarding  
14 the question of whether any discovery cut off date was set by the Court at the Initial  
15 Status Conference and, in turn, whether the Court extended the period of discovery  
16 when it granted Transamerica’s August 8, 2019 ex parte continuance application on  
17 August 26, 2019 (ECF No. 40).

18           7.     All the parties have timely served their Initial Disclosures. The parties  
19 have exchanged with the extensive written discovery. Plaintiff has reported that it  
20 intends to take over 10 depositions of the doctors and parties involved in the case. On  
21 October 25, 2019, Plaintiff filed a motion to compel information and documents from  
22 Defendant Vladimir Lukashin. The motion presently is set for hearing on November  
23 21, 2019.

24           8.     On August 8, 2019, Plaintiff filed the Ex Parte Application to Continue  
25 Trial. Plaintiff requested a continuance of the trial from October 22, 2019 to February  
26 19, 2020. Plaintiff reasoned that it will suffer irreparable prejudice if its application is  
27 not granted, because it needed more time for the discovery.

1           9.     On August 26, 2019, the Plaintiff's Ex Parte Application was granted.  
2 Final Status Conference was reset for January 13, 2020, Trial was reset for January  
3 21, 2020.

4           10.    On October 16, 2019, I filed the Notice of Unavailability, which was  
5 entered on October 20, 2019. I advised that I will be unavailable for all purposes  
6 concerning the litigation, through and including February 29, 2020.

7           11.    To reiterate, the instant Ex Parte Application is the first request of  
8 Defendant Vladimir Lukashin to continue the trial and the scheduled pre-trial events  
9 in this matter.

10          12.    Attached hereto as Exhibit 1 is a true a correct copy of the Joint  
11 Stipulation to Continue Trial, as one of the grounds for the instant Ex Parte  
12 Application of Defendant Vladimir Lukashin. The Stipulation is prepared and signed  
13 by all the parties who appeared in the action. Defendant Lukashin seeks by the instant  
14 application a relief on the terms set forth in the Joint Stipulation.

15          13.    I sincerely believe that there is a good cause for granting the relief sought  
16 by the instant ex parte application. It concerns my family, for which an extraordinary  
17 and heavy hearted situation is created. I have to take care for the immediate family  
18 members with a serious and acute health conditions. It is my mother and mother in  
19 law. The health conditions of my mothers is rapidly deteriorating, and the  
20 circumstances of the needed care are such that it creates the non-delegable  
21 responsibility for myself.

22          14.    I believe that the requirement for the diligence on behalf of my client is  
23 satisfied here. We have complied with all the Court's schedules, the pretrial  
24 preparations. I served on behalf of my client the necessary discovery requests and  
25 responded to the discovery propounded on him. I have been in contact with the  
26 attorneys representing the other parties, and initiated the Joint Stipulation filed  
27 herewith.

